

Al Broadbent

Volume 1, Pages 1-173¹

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

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SUZANNE GENEREUX, ET AL, *

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Plaintiffs, *

*

v. * Case No: 04-CV-12137

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JLT

AMERICAN BERYLLIA * USDC District of

CORPORATION, ET ALS, * Massachusetts

*

Defendants. *

* * * * *

DEPOSITION OF ALFRED BROADBENT

Deposition taken at the law offices of Getman,
Stacey, Schulthess & Steere, P.A., Three Executive
Park Drive, Bedford, New Hampshire, on Wednesday,
June 7, 2006, 10:00 a.m. to 2:08 p.m.

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1 I can't see her not being on it.

2 Q. Did anyone ever ask you to tell them who should
3 be on the beryllium list?

4 A. No. They had already premade it up.

5 Q. In the classes that Mr. Hartford gave on
6 beryllium oxide, what did he say about the
7 dangers of working with beryllium oxide?

8 A. The do's and don't's, "don't do this" and "don't
9 do that" and -- you know.

10 Q. What were the things he said not to do?

11 A. Oh, I can't remember exactly. I know he went
12 into the beryllium windows and he also went into
13 the beryllium on metal, like machining it. You
14 got to keep it cool all the time, fluids running
15 over, no grinding it, things like that.

16 Q. Did he explain that exposure to beryllium oxide
17 can cause a lung disease?

18 A. Oh, yeah. I do remember him saying that.

19 Q. Did he hand out any written materials at these
20 meetings?

21 A. I can't -- I can't remember.

22 Q. Did he show any slides or movies?

23 A. I don't remember any slides or movies.

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1 A. Not to my knowledge.

2 Q. Where was this Spencer Laboratories located?

3 A. Spencer's in Burlington.

4 Q. Roughly what time period were the buildings
5 renovated?

6 A. Oh, boy. Gee, I'm terrible on time. Gee, I
7 can't come up with a --

8 Q. I don't want you to guess. You can just say, I
9 don't know, I don't remember.

10 A. I don't really know the exact time.

11 Q. You -- at some point during your deposition,
12 you've used the terms beryllium and beryllium
13 oxide interchangeably and beryllia. Are you
14 familiar with the difference between solid
15 beryllium metal and beryllium oxide?

16 A. Yes, I am.

17 Q. Okay. So when you said beryllium --

18 A. Beryllium, in this particular deposition, I'm
19 talking windows.

20 Q. So which would be beryllium oxide?

21 A. Yes.

22 Q. Okay. Were you familiar with any Raytheon
23 Waltham facilities for working with beryllium

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1 metals during that time period of '83 to '86?

2 A. There was a small amount. Most of it was
3 carried out in the machine shop downstairs and
4 they knew how to handle it, and what they would
5 do is run coolant and there was machining and
6 that. They knew how to do it. But we didn't do
7 it.

8 Q. Okay. So Department 3670 did not work with
9 beryllium metal?

10 A. No; no, not machining or anything like that.
11 The only beryllium metal that we had were
12 beryllium tools because they're nonmagnetic, and
13 when you're working with big magnets, if you use
14 a magnetic tool, you go to tighten a nut or
15 something and the wrench would stick to a
16 magnet, so the nonmagnetic tools were used
17 because they're nonmagnetic. But other than
18 that, that's the only thing we used - beryllium.

19 Q. So just to clarify that, you might have used
20 some beryllium containing tools in your process,
21 but you didn't --

22 A. Wrenches.

23 Q. Okay, wrenches.